

**EXHIBIT 3**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**DANNY R. TEAGLE and JESUS SALAZAR,  
JR., individually and on behalf of all others  
similarly situated,**

**Plaintiffs,**

**v.**

**LEXISNEXIS SCREENING SOLUTIONS,  
INC., formerly known as CHOICEPOINT'S  
WORKPLACE SOLUTIONS, INC.,**

**Defendant.**

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**No. 1:11-CV-1280-RWS-JSA**

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**Jury Trial Demanded**

**DECLARATION OF LEONARD A. BENNETT  
IN SUPPORT OF MOTION FOR FINAL APPROVAL  
OF CLASS ACTION SETTLEMENT AND RELATED ORDERS**

Leonard A. Bennett, declares:

1. My name is Leonard A. Bennett. I am over 21 years of age, of sound mind, capable of executing this declaration, and have personal knowledge of the facts stated herein, and they are all true and correct.
2. I am one of the attorneys working on behalf of the Plaintiffs in the above styled litigation, and I am an attorney and a principal of Consumer Litigation Associates, P.C., a seven- attorney law firm with offices in Hampton Roads, and Alexandria, Virginia. My primary office is at 763 J. Clyde Morris Blvd, Suite 1A, Newport News, Virginia 23601.
3. Since 1994, I have been and presently am a member in good standing of the Bar of the highest court of the State of Virginia, where I regularly practice

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law. Since 1995, I have been and presently am a member in good standing of the Bar of the highest court of the State of North Carolina. I have also been admitted to practice before and am presently admitted to the following federal courts:

<b>Name of State or Federal Bar or Court</b>	<b>Date Admitted</b>
United States Supreme Court	3/21/05
United States Court of Appeals for 4 <sup>th</sup> Circuit	9/7/07
United States Court of Appeals for 3 <sup>rd</sup> Circuit	6/6/07
United States Court of Appeals for 9 <sup>th</sup> Circuit	8/1/09
United States Court of Appeals for 6 <sup>th</sup> Circuit	10/14/11
United States Court of Appeals for 11 <sup>th</sup> Circuit	6/13/11
Virginia State Bar	11/1/94
North Carolina State Bar	4/7/95
United States District Court of North Carolina (Eastern District)	4/19/05
United States District Court of North Carolina (Western District)	10/26/07
United States District Court of North Carolina - (Middle District)	3/3/09
United States District Court of Illinois	11/17/03
United States District Court of Virginia - (Eastern District)	11/18/94
United States District Court of Virginia (Western District)	2004
United States District Court of Wisconsin - (Western District)	9/16/08
United States District Court of Wisconsin (Eastern District)	3/9/06
United States District Court of Michigan (Eastern District)	2/19/04
United States District Court of Ohio (Northern District)	2011
United States District Court of Tennessee (Western District)	6/2012

4. I have been admitted pro hac vice in United States District Courts across the country including Alabama, California, Louisiana, Florida, Rhode Island, Hawaii, New Hampshire, Connecticut, Ohio, South Carolina, Pennsylvania, Arizona, Massachusetts, Tennessee, Georgia, Wyoming, Texas, Louisiana, Washington and Maryland. I have never been denied admission pro hac vice.

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5. Since 1996, my practice has been limited to consumer protection litigation. While my experience representing consumers has come within several areas, my most developed area of expertise is in plaintiffs litigation under the Federal Consumer Credit Protection Act, 15 U.S.C. § 1601, et seq., and in particular the Fair Credit Reporting Act, 15 U.S.C. § 1681, et seq., the Equal Credit Opportunity Act, 15 U.S.C. § 1691, et seq., and the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, et seq.

6. I am on the Board of Directors of the National Association of Consumer Advocates, on the Partners Council of the National Consumer Law Center and a member of the Public Justice Foundation. I was selected to the Law Dragon Top 500 Plaintiffs Attorneys in the Nation. In 2010, I was selected to the Law Dragon Top 3,000 Attorneys in the Nation (all attorneys, not simply Plaintiffs). In 2009 I was selected as a Virginia Leaders in the Law through the Virginia Lawyers Weekly based on my "[n]ationally recognized expertise in consumer protection law." I am a current and multiple-year Virginia Super Lawyer.

7. I have been invited to and did testify before the United States House Financial Services Committee on multiple occasions. I have also been invited to and did serve on a Federal Trade Commission Round Table and Governor Kaine's Virginia Protecting Consumer Privacy Working Group, all in this field.

8. Since 2001, I have been asked to and did speak at numerous seminars and events in the area of Consumer Credit Protection litigation. These included the following:

**2013**

National Consumer Law Center, Fair Debt Collection Practices Act Conference, Fair Credit Reporting Act Claims Against Debt Buyers, March 2013

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**2012**

National Association of Consumer Advocates, Webinar CLE: FCRA Dispute Process, December 2012

Rossdale CLE, Fair Credit Reporting Act, August 2012

**2011**

Virginia Trial Lawyers Association, Advocacy Seminar, October 2011, multiple locations;

National Association of Consumer Advocates, Fair Credit Reporting Act, National Conference Memphis, TN, May 2011, Speaker, Multiple Panels

Stafford Publications CLE, National Webinar, April 2011  
"FCRA and FACTA Class Actions: Leveraging New Developments in Certification, Damages and Preemption."

**2010**

National Consumer Law Center, National Consumer Rights Conference, Boston, Speaker for Multiple Sessions, November 2010;

**2009**

Virginia State Bar, Telephone and Webinar Course, Virginia, 2009  
"What's Going On Here? Surging Consumer Litigation- Including Class Actions- in State and Federal Court";

National Association of Consumer Advocates, Fair Credit Reporting Act National Conference Chicago, IL, May 2009, Multiple Panels

National Consumer Law Center, National Consumer Rights Conference, Philadelphia, Speaker for Multiple Sessions, November 2009;

**2008**

National Consumer Law Center, National Consumer Rights Conference, Portland, OR, Speaker for Multiple Sessions, November 2008;

Washington State Bar, Consumer Law CLE, Speaker, September 2008

**2007**

Washington State Bar, Consumer Law CLE, Speaker, July 2007

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House Financial Services Committee, June 2007

National Consumer Law Center, National Consumer Rights Conference, Washington, D.C., Speaker for Multiple Sessions, November 2007

National Association of Consumer Advocates, Fair Credit Reporting Act National Conference Denver, Colorado, May 2007,  
Multiple Panels;

U.S. Army JAG School, Charlottesville, Virginia, Consumer Law Course Instructor, May 2007

Georgia State Bar, Consumer Law CLE, Speaker, March 2007

### 2006

Contributing Author, Fair Credit Reporting Act, Sixth Edition, National Consumer Law Center, 2006.

National Consumer Law Center, National Consumer Rights Conference, Miami, FL, Speaker for Multiple Sessions, November 2006

Texas State Bar, Consumer Law CLE, Speaker, October 2006  
Federal Claims in Auto fraud Litigation

Santa Clara University Law School, Course, March 2006  
Fair Credit Reporting Act.

Widener University Law School, Course, March 2006  
Fair Credit Reporting Act.

United States Navy, Navy Legal Services, Norfolk, Virginia, April 2006  
Auto Fraud,

9. I have substantial experience in complex litigation, including class action cases, prosecuted under the Consumer Credit Protection Statutes, including the Fair Credit Reporting Act, the Equal Credit Opportunity Act, and the Fair Debt Collection Practices Act.

10. In each of the class cases where I have represented Plaintiffs in a consumer protection case, including employment related cases such as the instant case,

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the Court found me to be adequate class counsel and in each I was lead or executive committee counsel.

11. I have litigated an extensive docket nationally. I am familiar with the number and identity of attorneys in other parts of the country who practice in this field. There are a very limited number of such practioners and fewer still willing to litigate within this field. I estimate that there are less than ten private attorneys nationally who have significant experience litigating the provisions of the Fair Credit Reporting Act, and less than a handful in the "employment purpose" FCRA field at issue in this case. Over the last several years, I have been the lead invited speaker at the primary consumer law conferences to instruct on the Fair Credit Reporting Act regarding issues in employment law.

12. In this case, my firm and I associated co-counseled with attorneys who have similar experience, expertise and commitment both in the area of consumer protection law and class action litigation. I know each attorney and each law firm to be of the highest degree of capability and ethics. In particular, I know first hand that Michael Caddell, Cynthia Chapman and Craig Marchiando each have substantial experience in this very specialized field of FCRA class action litigation. I estimate that the strong majority of all of the top dozen FCRA class action outcomes have been obtained by our two firms.

13. Plaintiffs commenced this action with an expert knowledge of the violations by LexisNexis and its product. In fact, this is not the first putative class action that Plaintiffs' counsel have filed contending that LexisNexis failed to comply with the notice provisions of the FCRA. I was the first attorney to prosecute the previous

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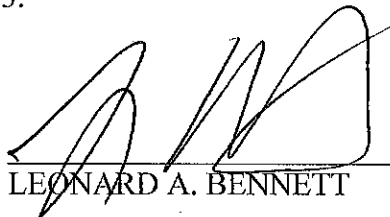
actions, *Williams v. LexisNexis* and *Beverly v. ChoicePoint* that formed the basis for the present action against the successor to these two previously separate reporting agencies.

14. Throughout this case from conception, pre-filing, discovery, negotiations and settlement I have been active as one of the primary attorneys representing the Plaintiff and the class.

15. To date, my firm has expended a total greater than 224 hours in litigating this case, including legal research, discovery, drafting and edits, and negotiations. In individual federal case litigation, my hourly rate is \$475.00 and Mr. Erausquin's rate is \$400.00. In addition to these two attorneys of record, we have involved one other associate (hourly rate of \$375.00) as well as two FCRA paralegals (billed at \$150.00 an hour). My firm's total lodestar fee inclusive of expenses exceeds \$79,000.00.

I declare under penalty of perjury of the laws of the United States that the foregoing is correct.

Signed this 19th day of July, 2013.

  
LEONARD A. BENNETT

LEONARD A. BENNETT  
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